

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

JUSTICE FOR THE NEXT GENERATION, et al., v. TERRY JOHNSON, et al., Defendants.))) Plaintiffs,)))))))) Defendants.	Civil Action No. 1:20-cv-00998
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JOINT MOTION TO STAY ALL PENDING DEADLINES

Plaintiffs and Defendants have made substantial progress in their ongoing settlement discussions. While a final agreement has not yet been reached, the parties jointly agree that a three week (21 day), temporary stay of litigation and near-term deadlines would be useful in allowing the parties to focus on reaching settlement and resolving the present litigation. Accordingly, Plaintiffs and Defendants jointly move for a temporary stay and modification of deadlines specified herein. The Parties show the following in support of this joint motion:

- On March 2, 2022, the Parties held a mediated settlement conference, with Tom Duncan appointed by this Court as mediator. The Parties did not reach a resolution during the mediation, but Mr. Duncan continued to facilitate and continue the settlement discussions between the Parties.
- Recently, the Parties made substantial progress towards achieving a resolution.
- Mr. Duncan, with the agreement of the Parties, recommended a three week

stay of pending deadlines for the Parties to focus on resolving the remaining issues and reaching a settlement agreement in principle.

The Parties are in the middle of discovery and have exchanged multiple rounds of discovery requests and responses. The Parties have substantial, upcoming discovery obligations in May 2022, including several dates in the parties' amended scheduling proposal that this Court approved. *See* DE 92. In an effort to prevent undue expense and promote judicial economy, and to allow the parties to focus their effort on settlement, the Parties request the following deadline modifications:

- This proceeding be stayed through May 2, 2022. The parties will not file motions or serve new discovery during this time period and all pending deadlines shall be stayed.
- The deadline for Newly Added Parties¹ to serve, and for Plaintiffs to supplement, their Fed. R. Civ. P. 26(a) initial disclosures shall be extended through May 30, 2022.
- The deadline for Newly Added Parties to serve their responses and objections to the previously served common interrogatories and requests for production shall be extended from May 16, 2022 to June 6, 2022.
- The deadline for Plaintiffs to supplement their prior responses and objections regarding the Newly Added Parties to the previously-served common interrogatories and request for production, answering with respect to the Newly

¹ The individuals added to this litigation pursuant to the Plaintiffs' Second Amended Complaint. (DE 71).

Added Parties, shall be extended from May 16, 2022 to June 6, 2022.

- The deadline for the Newly Added Parties to complete their document production shall be extended from May 23, 2022 to June 13, 2022.
- The deadline for the Parties to disclose their privilege logs shall be extended from May 30, 2022, to on or before June 20, 2022.
- The deadline for Defendants to respond or object to Plaintiffs' Interrogatory Numbers 11 and 12 shall be extended from April 11, 2022, through ten (10) days after the conclusion of the presently sought stay.

The parties will either file a dismissal of this action, resume this matter, or approach this Court regarding case posture on or before May 2, 2022. The parties submit this request in good faith, without intention to improperly delay this proceeding, and based on the hope and expectation that this brief stay will allow the parties to reach a compromise of their disputed claims that would result in the dismissal of this lawsuit.

Respectfully submitted, this the 11th day of April, 2022.

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